RETIREMENT PLAN RECORDKEEPING & ADMINISTRATION

Administrative User Manual

VERSION I

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DISCLOSURE: This manual is intended solely as a guide and is subject to change without notice. Please contact your Alliance Benefit Group Account Manager if you need further assistance.

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Section 1

WELCOME TO ALLIANCE BENEFIT GROUP

An introduction to the Alliance Benefit Group Administrative User Manual and accessing your retirement plan…

Welcome! Alliance Benefit Group is excited to work with you and your retirement plan. This user manual is your go-to guide for procedural questions related to the day-to-day operation of your plan. We encourage you to utilize this manual for convenient and quick access to recordkeeping and administrative procedures.

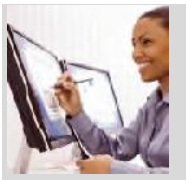
Your Account Manager is the main point of contact for any plan-related questions. Should you have additional questions that are not addressed in this manual, please call **1.800.898.9344** and ask to speak to the Account Manager assigned to your specific plan.

Retirement Account Information Center

Accessing your retirement plan account is made easy in two ways: online via the web or by phone using our Voice Response Unit (VRU).

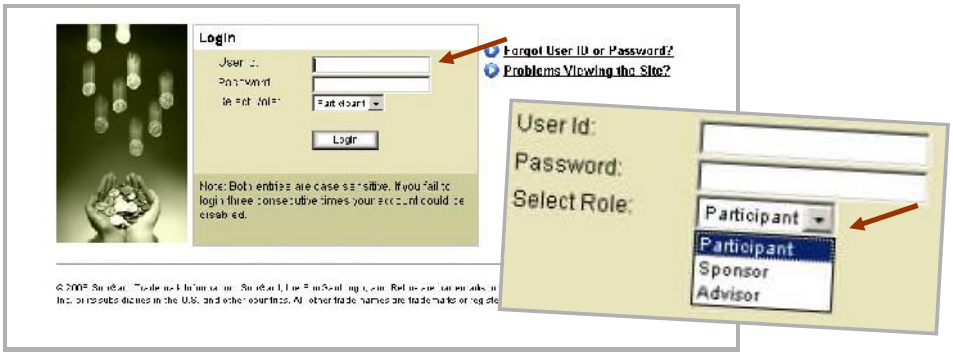
Website Navigation

Our website enables the plan sponsor, advisor and participant online access to view and manage your entire account online 24/7. View reports, utilize special tools, review personal information and keep up-to-date with important announcements all through one site.



Menus & Features

- You must log in to the site by visiting www.abgncs.com
- Log in selecting the appropriate **role, user name** & **password**
- Click on your plan



For Participants, each will receive directions on accessing their account upon enrollment in the plan. For problems logging in or questions on navigating through the site, please contact Alliance Benefit Group's **Call Center at 1.800.495.4015**.

For Plan Sponsors, upon the conversion of your plan, you will receive a guide and login information to the plan sponsor website. This website offers several menus & features that will assist you in monitoring plan activity, providing management reports, responding to requests and general plan administration.

These features include:

EE SEARCH

All Transactions Screen | Provides **access to participant's account** information. A search bar is also available on any screen for your convenience.

ACCOUNT INFO

Plan Summary Screen | Provides **plan information** such as plan name, plan year, number of participants, frequency of contribution processing, status of "top heavy" **testing** and a report of **plan assets** showing balances by investment fund and by source of contribution.

Plan Balance Screen | Provides **current balance information** by source of contribution and by investment option - For each source with a balance, the **individual fund balances** can also be displayed. In addition, this screen will provide all **pending trades** by source and by fund. By clicking on a model name, you will see the **underlying funds** and **percentages** for that model.

Investment Profiles Screen | Provides a listing of **plan investment options**, the Morningstar **asset class** for each fund option and the current **price per share** for each fund. In addition, this screen provides links to **Morningstar** for additional fund information.

Investment Returns Screen | Provides **rate of return** information for each fund available in the plan.

Categories Screen | Provides **plan demographic** data primarily utilized for plan administration in order to calculate & allocate contributions and conduct plan testing.

TOOLS

Reports Screen | Provides reports of **plan activity** for user selected periods or participant activity for user selected participant.

Forms Screen | Provides **forms** for the plan including distribution forms and enrollment forms.

Validation Center Screen | Provides for the **electronic upload** of payroll information.

DER Layout Screen | Provides for a **detail description** of the file format needed for **electronic submission** of the payroll info (DER stands for Data Entry Routine).

Plan Limits | Provides information on **plan limits.**

Contact ABG | Provides access to our **Alliance Benefit Group team** for any questions or inquiries.

Quick Links

Links can be used to access info within the website as a *quick-link*.

TRANSACTIONS

All Transactions Screen | Provides a **history of transactions** that have occurred in each participant's account with user ability to sort the information in multiple views.

Web/VRU Requests Screen | Provides a **history of transaction requests** made by **participants** on either the website or VRU.

TRANSACTION ENTRY

Transaction Entry Access | Similar to the EE Search function, this tab provides **access to participant account** information. This is a great tool for **accessing transaction screens** within a participant's account; you can easily switch from one participant to another.

Voice Response Unit

Upon enrollment in the plan, a memo will be sent to all participants containing a **Personal Identification Number** (PIN); this is what will be used to access the VRU.

Participants can conveniently access the retirement account 24 hours a day, 7 days a week. Our highly trained team of Customer Service Representatives is also available to answer questions Monday through Friday, 7 a.m. to 6 p.m. Central Standard Time. [1]

Accessing Your Account

To access your account, dial **1.800.495.4015** and choose prompt **#2**; for customer service, press prompt **#3**.

- Enter **1** for English, **2** for Spanish
- Enter your **Social Security Number**
- Enter your **PIN**

[1] Except on major holidays

Choose from the following options:

1 Personal Account Information
- **1** *Balance Information*
- **2** *Investment Information*
- **3** *Contribution Information*
- **5** *Transfer Between Investments*
- **6** *Confirm Ending Balances*
- ***9*** *Return to Previous Menu*

2 Current Investment Options

3 To Change PIN

9 To End Call

Helpful Hints

If you know the selection you wish to access, you can select that at any time

- Pressing ***21** will direct you to fund prices, or pressing ***1** will automatically direct you to account balances.
- The star key [*] will cancel almost any selection and will automatically return you to the Main Menu

Section 2

PROCESSING

Alliance Benefit Group processing procedures including new employees, contributions & transfers…

New Employees

If you would like to **add a new employee** to the plan or if an employee has a **rollover from another account:**

1. **Distribute** election or rollover form to employee | See Figures Below

Downloading a Form

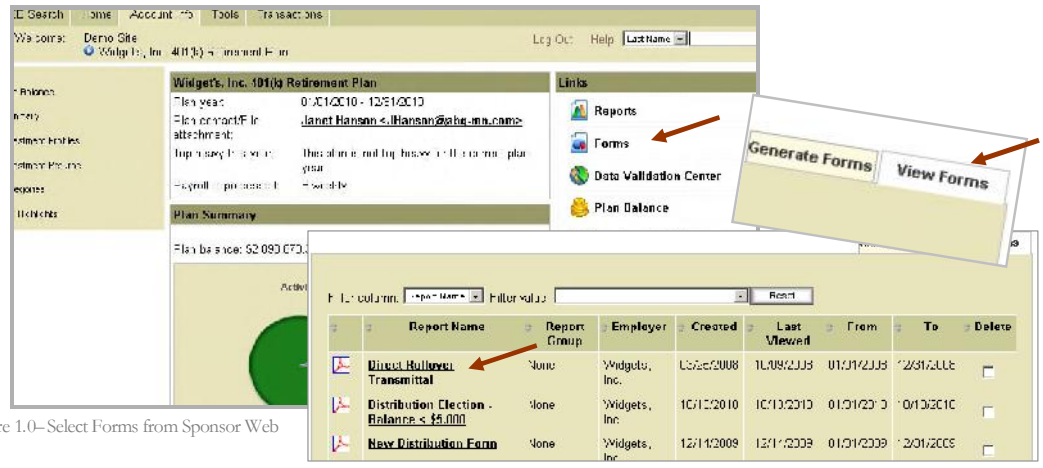


Figure 1.0– Select Forms from Sponsor Web

Figure 2.1 – Click View Forms Tab & select appropriate form

Online Enrollment

Your plan may offer online enrollment. If so, visit www.abgretirement.com/enrollment. For further questions, please contact your Account Manager.

2. Once received, **review** to ensure all required information has been filled out and all signatures are obtained
3. **Submit** completed election or rollover form to contributions@abg-mn.com

For new employees, the employee will receive notification by mail when their individual account has been set-up within the plan.

If your plan has opted for **enrollment booklets**, please contact your Account Manager as needed for any new orders.

Note: ABG will only hold a rollover check or deposit without paperwork for five (5) business days.

For rollovers, checks must be made out as directed by your investment company. Please check rollover paperwork for specific instructions and complete checks accordingly (i.e. investment company &/or plan name). This check must accompany the employee's rollover paperwork.

Contribution Information

Sending your contribution information can be done using the Data Validation Center (DVC).

Data Validation Center | DVC

Each payroll period, log in to the Sponsor web and follow the steps below:

1. **Upload** your contributions to our secure DVC via the web | Reference your DVC Manual for detailed instructions
2. We will **receive automated notification** once your file has been uploaded directly to our system
3. If funds are pulled for the contributions, we will **initiate the pull** within 1 business day of receiving the file. Otherwise, we hold the file until funds are received.

Payroll Files

Payroll files will be processed based on the allocations for each participant at the time of the file submission

Transfers & Changes

If an employee wants to make a transfer or allocation change on their account, they can do so 24 hours/day by logging on to the web at www.abgncs.com and selecting **Participant**.

Please note: *The participant must print a copy of the confirmation number for their records; no confirmation is mailed out for such changes made online. This confirmation can also be retrieved under the* ***Reports*** *link in the* ***Tools*** *menu.*

Loan Payments

Generally, loan payments are processed with the contribution file; however, a participant can choose to issue a check to pay off their loan at any time.

If an employee sends in a check to payoff their loan, please send notification to contributions@abg-mn.com to alert us of the separate submission. | To ensure proper placement of the funds, the employee must reference the account in the memo field (i.e. Fidelity Acct #999-999999)

Employee Changes

Throughout the year, employees may need to **update** their personal **contact information** such as address or phone number. An employee can make this change to their own account 24/7 via the participant web: www.abgncs.com & select **Participant.**

You can send this information to contributions@abg-mn.com or contact our Customer Service Representatives at **800-495-4015.**

Quarter-End Processing & Reporting

At the close of each plan year quarter, **data is compiled** on a cash-basis and a **valuation report** is sent to the plan sponsor via the sponsor web.

Participant statements are then generated using this data. These can be produced as a **hard copy** or as an **e-statement** on the participant web.

Section 3

DISTRIBUTIONS

This section goes through the distribution process for any money taken out of the plan and explains the different distribution methods…

With general distribution procedures, distribution forms can be requested via the plan sponsor web by visiting, www.abgncs.com and selecting **Employer.**

Once logged in, you can download the form under the **Forms** tab| See Figures Below

Downloading a Form

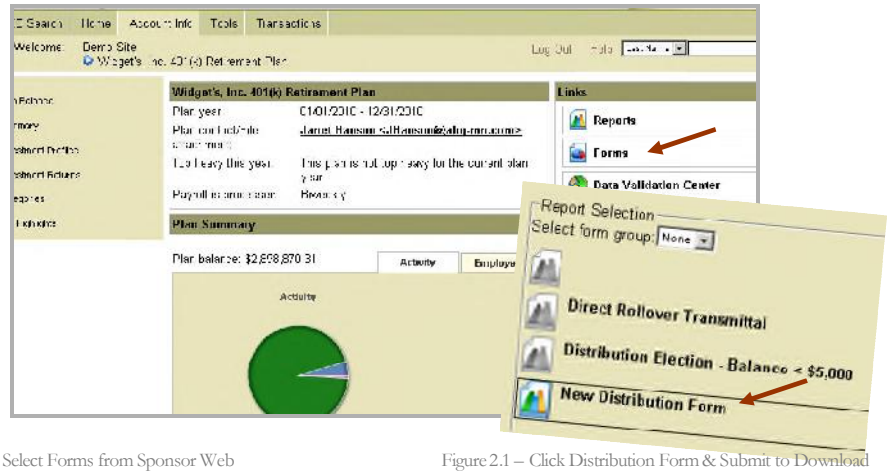


Figure 2.0 – Select Forms from Sponsor Web

Figure 2.1 – Click Distribution Form & Submit to Download

The forms will populate with the employee's current information and options specific to the plan.

1. **Distribute** form to employee for **completion,** following step-by-step instructions
2. **Return** form to Alliance Benefit Group for processing via fax, email, or regular mail as instructed on the form

3. Alliance Benefit Group receives the form and **verifies** completeness
4. **Processed** and **checks issued** within 10 business days

Special Mailing Instructions?

Any special mailing instructions, including **wire**, **direct deposit** or **overnight**, must be written in on the form. If not noted otherwise, all checks will be sent via regular mail.

Loan Distributions

For plans that have loans available, **loan forms** can be found on the plan sponsor website or by calling the Alliance Benefit Group Call Center and requesting a form.

Unless the plan only allows for hardship loans, a loan can be taken out for any purpose and will be included on the application as a selection.

Note: Proof must be provided when applying for a **hardship loan**.

How to Apply

1. Download a **Loan Form** from the Sponsor web | See Figure 1.0 & 1.1 on downloading forms (pg 5)
2. Obtain **completed** form from employee including length desired (max 5 years for personal loans) and requested amount (max is 50% of your account balance not exceeding $50,000).
3. **Submit** the form to Alliance Benefit Group as instructed on the form
4. Alliance Benefit Group receives the form and **verifies** completeness
5. **Processed** and **checks issued** within 5 business days

Upon processing the loan, a loan amortization schedule is provided to the plan sponsor. The payment dates go according to the pay schedule for the participant in our system. If the pay date or frequency is incorrect, please contact Alliance Benefit Group to make appropriate adjustments; a new amortization schedule will be sent. Once received, payments are to start as instructed until the loan is paid off. If the loan is not paid by the due date, it will become taxable.

Principal Residence Loans

Principal Residence Loans are available for the first-time purchase of your dwelling. Procedures for applying are the same though you will need **documentation** of the home purchase when applying.

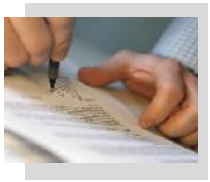
This type of loan can be taken out for a **longer period of time,** possibly 10-15 years, depending on the loan provisions in the plan. The requested dollar amount restrictions will remain the same.

Hardship Distributions

Once all other means for requesting money from the plan have been exhausted, a hardship distribution, if allowable under the plan, may be completed.

If the plan allows for loans, a denied loan form must be submitted to Alliance Benefit Group before processing a hardship distribution.

Hardship distributions can be restricted to only certain funds and sources per the plan document. This may include the inability to take your gains on contributions as a hardship.

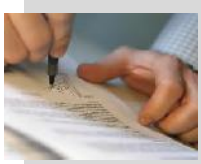


How to Apply

1. Download a **Hardship Distribution Application** from the Sponsor web for employee | See Figure 1.0 & 1.1 on downloading forms (pg 5)
2. Obtain **completed** form from employee including the **requested amount** and appropriate **documentation** regarding their hardship, to be kept on file with the plan sponsor
3. **Submit** the form to Alliance Benefit Group as instructed on the form
4. Change **deferral elections** to zero (0) for the period of time elected by the plan | i.e. 6 months to 1 year
5. Alliance Benefit Group receives the form and **verifies** completeness
6. **Checks issued** within 10 business days

In-Service Distributions

If in-service distributions are allowable under the plan, the selection will display on the distribution form. This option is available only for participants that fall under the defined age category and are still employed | i.e. 59 ½



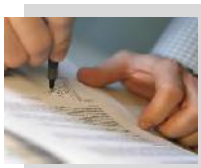
How to Apply

1. Download a **Distribution Application** from the Sponsor web for employee | See Figure 2.0 & 2.1 on downloading forms (pg 8)
2. Obtain **completed** form including the **requested amount** from employee | Requested amount can be taken in a **lump sum** (mandatory 20% withholding applies) or **rollover**
3. **Submit** the form to Alliance Benefit Group as instructed on the form
4. Alliance Benefit Group receives the form and **verifies** completeness
5. **Checks issued** within 10 business days

Termination Distributions

Upon termination, a distribution form can be given to the employee for completion. All information must be completed informing Alliance Benefit Group of the **termination date**, **last payroll date** and accurate **hours for vesting**, if applicable.

In accordance with the plan document, termination distributions may be taken in **lump sum**, **installments**, **rollovers,** or, if the minimum dollar amount requirement is met, **defer to stay in the plan.**



How to Apply

1. Download a **Distribution Application** from the Sponsor web for employee | See Figure 2.0 & 2.1 on downloading forms (pg 8)
2. Obtain **completed** form from employee and include **important dates** & **hours for vesting**
3. **Submit** the form to Alliance Benefit Group as instructed on the form
4. Alliance Benefit Group receives the form and **verifies** completeness
5. **Checks issued** within 10 business days

70.5 Distributions

Each year, Alliance Benefit Group will run reports and contact the employer to verify any participants that have obtained the **70.5 status**. Once these lists are verified, a **70.5 Required Minimum Distribution Election Form (RMD)** is sent to the participants explaining their available options.

- If **no longer working** or a **5% owner**, they must **take a distribution**
- If **still working** and **not a 5% owner**, they may **postpone their election**

This process typically takes place during the second (2nd) half of the year; however, participants may call in to elect their RMD at *any time* during the year.

Processing an RMD

1. Upon receipt of report from Alliance Benefit Group, **verify** any participants that have obtained the **70.5 status**
2. Alliance Benefit Group **sends participant RMD** including their **available options**
3. **Complete** & **submit** the form to Alliance Benefit Group
4. Alliance Benefit Group receives the form and **verifies** completeness
5. **Processed** &/or **checks issued** within 10 business days

Note: If forms are not returned to Alliance Benefit Group, the distribution will be paid out to terminated participants and no taxes will be withheld. For non-terminated participants, ABG will confirm their status and ensure that they have not had an RMD in the past.

Rollover Systems

If a plan has an IRA option of **$0 - $5,000** or **$1,000 - $5,000**, an IRA must be set up to abide with the plan document stating that **terminated participants** with **balances less than $5,000** must be **forced out** of the plan.

If an IRA provider is not available with the client, Alliance Benefit Group will use RolloverSystems®.

Alliance Benefit Group also offers a one-time service, sending a distribution form to terminated participants with balances exceeding $5,000; such amounts cannot be forced out.

Processing a Rollover

1. Termination dates are submitted to Alliance Benefit Group through payroll file or email & entered in our Data System
2. A weekly upload of these dates is **submitted** to RolloverSystems®
3. RolloverSystems® sends **letters to these terminated participants** and a timer of 60 days begins
4. If no distribution form is received **within 60 days** & a **balance** still exists, Alliance Benefit Group will first verify the termination status has not changed and will then automatically **pay these participants out** in accordance with the IRA option chosen by the plan

Section 4

TESTING

This section outlines the testing procedures for your plan to ensure regulatory compliance…

Each year, the plan sponsor is sent a Data Request to inform Alliance Benefit Group of any changes that were made to the plan or employer structure during the previous 12 months. This request will accompany the year-to-date census file. If we do not receive the complete data for a plan throughout the year, a census file will be requested at year-end.

Non-Discrimination Testing

Once all data has been verified, the appropriate annual non-discrimination testing is completed. The following tests are completed based on the provisions of the plan:

- Actual Deferral Percentage Test | ADP
- Actual Contribution Percentage Test | ACP
- Excess Deferral Test | 402(g)
- Minimum Coverage Test | 410(b)
- Non-Discrimination Test | 401(a)(4)
- Top Heavy Test
- Annual Additions Test | 415
- Employer Deductibility
- Plan Level Limitation

Section 5

FORM 5500 PREPARATION

A step-by-step guide to submitting your Form 5500…

After your year-end testing is completed, your Form 5500 Annual Return/Report of Employee Benefit Plan will be completed by Alliance Benefit Group. Please note that this is for full-service clients only.

If your plan is a large plan requiring an annual independent audit, before your Form 5500 can be prepared, we will provide your auditor with an Audit Pack containing several reports they will need in order to perform the audit. They may also request some items directly from the plan sponsor.

Once the auditors have prepared a draft of your audit report, they will need to provide it to Alliance Benefit Group to be used in the preparation of the Form 5500.

Electronically Signing Form 5500

Once the Form 5500 has been prepared by Alliance Benefit Group, you will be notified via email that it is ready to electronically sign, using the following procedures:

Electronic Signature

Log in to the plan sponsor website Alliance Benefit Group has established for your retirement plan(s). If your company has more than one login, you must use the one assigned to you.

Once logged in, you will be able to access your Form 5500 Filing:

Step 1 | Tools → Web Client

- Opens the web page to **review**, **sign** and **print** your Form 5500

Step 2 | View Planbooks

- Select **Planbooks** item from the Main Menu

NEED MORE ASSISTANCE?

If you have any problems accessing the website or signing the Form 5500, please **contact** your Alliance Benefit Group **Account Manager**.

- Select **desired year** to view

Step 3 | View Plan Details

- Select **Planbooks**
- **View Forms** to display a list of forms

Step 4 | Signing Filing

- Return to **Plan List** & select **e-File** from the Actions column of the Planbook grid
- Walk through **signing ceremony**, applying your **User ID** & **PIN** code (Filing Signer Credentials)
- Agree to the **Perjury Statement** & select the **Agree & Save** button

Step 5 | Print Forms

- Select **Print** from the Action column of the Planbook grid

Section 6

DOCUMENTS

Keeping your plan document up-to-date with legislative changes and discretionary modifications…

During the conversion or establishment of your plan to Alliance Benefit Group, you will determine whether or not Alliance Benefit Group will (re)state your plan document and if so, your advisor will work with you on the design of your plan.

Please consult your advisor to determine if you will file with the IRS for a **Determination Letter.**

- Your **plan document** must be kept current with all **legislative changes** required by law. Alliance Benefit Group will keep you apprised of any such mandates.
- If you elect **discretionary modifications**, you must notify your Alliance Benefit Group Account Manager for a **plan amendment.**

Amendments

If you would like to make **modifications to your plan**, as mentioned above, contact your **Account Manager** with your requests.

Once the amendment is complete, you must distribute a **Summary of Material Modification** to all employees.

Remember!

If your Plan Document is written and maintained by an **outside provider**, please work with them for any mandatory or discretionary amendments.

Alliance Benefit Group **cannot** amend a document that another party has created.

QDRO Process

Qualified Domestic Relations Orders (QDRO) are submitted to your Alliance Benefit Group Account Manager. The Alliance Benefit Group Compliance Department will then review the form and work with the attorneys that drafted the Order for any revisions required to conform to the plan's written QDRO Procedure.

The QDRO is then sent to the Plan Administrator to approve. Once the approval is received, the Alliance Benefit Group Account Manager is instructed to split the account and proceed with distributing the assets as allowable by the Order.